

1 Lexi J. Hazam (SBN 224457)
2 *lhazam@lchb.com*
3 LIEFF CABRASER HEIMAN
& BERNSTEIN, LLP
3 275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
4 Telephone: (415) 956-1000
Facsimile: (415) 956-1000

5 Christopher A. Seeger (*pro hac vice*)
6 *cseeger@seegerweiss.com*
SEEGER WEISS, LLP
7 55 Challenger Road 6th Floor
Ridgefield Park, NJ 07660
8 Telephone: (973) 639-9100
Facsimile: (973) 679-8656

9 Previn Warren (*pro hac vice*)
10 *pwarren@motleyrice.com*
MOTLEY RICE, LLC
11 401 9th Street NW, Suite 630
Washington, DC 20004
12 Telephone: (202) 386-9610
Facsimile: (202) 232-5513

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14 *Plaintiffs' Co-Lead Counsel*

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16 [Additional Counsel Listed on Signature Page]

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18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA

20
21 IN RE: SOCIAL MEDIA ADOLESCENT
22 ADDICTION/PERSONAL INJURY
23 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR
MDL No. 3047

24 This Document Relates to:
25 ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER REGARDING TOLLING OF
APPLICABLE STATUTES OF
LIMITATION**

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1 Pursuant to Civil Local Rule 7-12, Plaintiffs and Meta Platforms, Inc., Facebook
 2 Holdings, LLC, Facebook Operations, LLC, Facebook Payments, Inc., Facebook Technologies,
 3 LLC, Instagram LLC, and Siculus Inc. (“Meta Entities”); Snap Inc.; TikTok Inc. and ByteDance
 4 Inc. (“TikTok Entities”); and YouTube, LLC, Alphabet Inc., and Google LLC (“Google Entities”)
 5 (collectively “Defendants”) (together the “Parties”) by and through their counsel of record hereby
 6 stipulate as follows:

7 WHEREAS, on October 6, 2022, the Judicial Panel on Multidistrict Litigation (“JPML”)
 8 issued an order transferring multiple cases pursuant to 28 U.S.C. 1407 to the Northern District of
 9 California as MDL No. 3047 (ECF No. 1);

10 WHEREAS, the Parties anticipate that the JPML will continue to issue conditional
 11 transfer orders transferring other cases to this venue;

12 WHEREAS, in Case Management Order No. 1 (“CMO No. 1”), issued on November 10,
 13 2022, this Court ordered the parties to meet and confer and to provide the Court with proposed
 14 orders or recommendations to facilitate judicious resolution of, among other topics, the filing of a
 15 master complaint and short form attachments by the next status conference set for December 14,
 16 2022 (ECF No. 75);

17 WHEREAS, on November 17, 2022, Plaintiff Brittney Stoudemire filed a motion for
 18 leave to amend her complaints to name additional specific Defendants (ECF No. 83);

19 WHEREAS, Plaintiff Stoudemire represented to Defendants and to the Court that she filed
 20 these motions because statutes of limitation governing claims not currently asserted in her
 21 complaints (including as against specific Defendants) continue to run;

22 WHEREAS, on November 21, 2022, Plaintiff Joleen Youngers filed a motion for leave to
 23 amend her complaint to provide identifying information about the adult plaintiffs in her suit who
 24 are presently identified by pseudonyms only (ECF No. 85);

25 WHEREAS, to avoid unnecessary motion practice seeking leave to amend complaints to
 26 add claims or Defendants or to identify Plaintiffs by their full names, the Parties have met and
 27 conferred and agreed, subject to Court approval, to the following:

1. With respect to Plaintiff Brittney Stoudemire and Plaintiffs in the *Younger* matter, all applicable statutes of limitation relating to claims asserted against the undersigned Defendants shall be tolled from November 22, 2022, until the deadline for filing short form complaints for such Plaintiffs, and, if no deadline is set or applies, thirty days after the filing of the master complaint;
2. For other Plaintiffs whose complaints have been filed in or transferred to MDL No. 3047 before Plaintiffs' master complaint is filed and who wish to file amended complaints, counsel for any such Plaintiffs shall notify Liaison Counsel for Plaintiffs and Defendants and meet and confer with Defendants regarding a tolling agreement. To facilitate an efficient conferral process, any Plaintiff seeking a tolling agreement shall in their initial request set out in writing the amendments for which they seek tolling. Defendants and any Plaintiffs seeking a tolling agreement shall meet and confer expeditiously and in good faith regarding any such request to avoid unnecessary motion practice. If the Parties agree to tolling for the complaint in question, the statutes of limitation shall be deemed tolled from the date the tolling was requested until the deadline for filing short form complaints for such Plaintiffs, and, if no deadline is set or applies, thirty days after the filing of the master complaint.
3. Subject to order of the Court, the motions for leave to amend filed at ECF Nos. 83 and 85 shall be denied without prejudice.

Dated: December 9, 2022

Respectfully submitted,

LIEFF CABRASER HEIMAN
& BERNSTEIN, LLP

By: /s/ Lexi J. Hazam
Lexi J. Hazam
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1000
lhazam@lchb.com

SEEEGER WEISS, LLP

By: /s/ Christopher A. Seeger
Christopher A. Seeger
55 Challenger Road 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Facsimile: (973) 679-8656
cseeger@seegerweiss.com

MOTLEY RICE, LLC

By: /s/ Previn Warren _____
Previn Warren
401 9th Street NW, Suite 630
Washington, DC 20004
Telephone: (202) 386-9610
Facsimile: (202) 232-5513
pwarren@motleyrice.com

Plaintiffs' Co-Lead Counsel

COVINGTON & BURLING LLP

By: /s/ Phyllis A. Jones
Phyllis A. Jones, *pro hac vice*
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

Attorney for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; and Mark Elliot Zuckerberg

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rosemarie T. Ring
Rosemarie T. Ring
GIBSON, DUNN & CRUTCHER LLP
555 Mission Street, Suite 3000
San Francisco, CA 94105-0921
Telephone: 415.393.8200
Email: rting@gibsondunn.com

Attorney for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Facebook Payments, Inc.; Facebook Technologies, LLC; Instagram, LLC; Siculus, Inc.; and Mark Elliot Zuckerberg

KING & SPALDING LLP

By: /s/ Geoffrey M. Drake
Geoffrey M. Drake
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: + 1 (404) 572-4600
Facsimile: + 1 (404) 572-5100
Email: gdrake@kslaw.com

Attorneys for Defendants TikTok Inc. and ByteDance Inc.

FAEGRE DRINKER LLP

By: /s/ Andrea Roberts Pierson
Andrea Roberts Pierson
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com

Attorneys for Defendants TikTok Inc. and ByteDance Inc.

MUNGER, TOLLES & OLSEN LLP

By: /s/ Jonathan H. Blavin
Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)

1 MUNGER, TOLLES & OLSON LLP
2 350 South Grand Avenue, 50th Floor
3 Los Angeles, CA 90071-3426
4 Telephone: (213) 683-9100
5 Facsimile: (213) 687-3702

6 Lauren A. Bell (*pro hac vice forthcoming*)
7 MUNGER, TOLLES & OLSON LLP
8 601 Massachusetts Ave., NW St.,
9 Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300

10 *Attorneys for Defendant Snap Inc.*

11 WILSON SONSINI GOODRICH & ROSATI
12 Professional Corporation

13 By: /s/ Brian M. Willen
14 Brian M. Willen
15 bwillen@wsgr.com
16 Vivek Tata
17 vtata@wsgr.com
18 1301 Avenue of the Americas, 40th Floor
19 New York, New York 10019
20 Telephone: (212) 999-5800
21 Facsimile: (212) 999-5899

22 Lauren Gallo White
lwhite@wsgr.com
23 Samantha A. Machock
smachock@wsgr.com
24 One Market Plaza, Spear Tower, Suite 3300
25 San Francisco, CA 94105
26 Telephone: (415) 947-2000
27 Facsimile: (415) 947-2099

28 Christopher Chiou
cchiou@wsgr.com
633 West Fifth Street
Los Angeles, CA 90071-2048
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

29 *Attorneys for Defendants YouTube, LLC, Google LLC,*
30 *and Alphabet Inc.*

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2 **IT IS SO ORDERED.**
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5 DATE: December 13, 2022
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Hon. Yvonne Gonzalez Rogers

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10 **SIGNATURE CERTIFICATION**
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12 Pursuant to Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose
13 behalf the filing is submitted, concur in this filing's content and have authorized this filing.
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15 Dated: December 9, 2022
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/s/ Jennie Lee Anderson

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22
23
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Jennie Lee Anderson
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Tel. (415) 986-1400
Fax. (415) 986-1474
jennie@andrusanderson.com

Plaintiffs' Liaison Counsel